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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC., AMERICAN
TECHNOLOGY SERVICES, COMPLIANCE
CONSULTANTS, CHROME BUILDERS
CONSTRUCTION, INC., UNIFIED DATA
SERVICES;

Plaintiffs,

v.

BANK OF AMERICA, N.A. and JOHN AND
JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-BNW

**UNOPPOSED MOTION TO EXCEED
PAGE LIMIT PURSUANT TO LOCAL
RULE 7-3(c) FOR DEFENDANT BANK
OF AMERICA'S OPPOSITION TO
PLAINTIFFS' SECOND MOTION TO
COMPEL (ECF NO. 195)**

Pursuant to Local Rules 7-3(c), Defendant Bank of America, N.A. ("BANA"), by and through their respective undersigned counsel of record, submits this Unopposed Motion to Exceed Page Limit Pursuant to Local Rule 7-3(c) for Defendant Bank of America's Opposition to Plaintiffs' Second Motion to Compel (ECF No. 195) ("Motion to Exceed Page Limit").

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This Motion to Exceed Page Limit is based on the Declaration of Holly E. Cheong, Esq. (attached hereto as **Exhibit A**), the Memorandum of Points and Authorities below, the papers and pleadings on file with the Court, and any oral argument that this Court may entertain on behalf of BANA.

MEMORANDUM OF POINTS AND AUTHORITIES

On May 12, 2021, this Court granted Plaintiffs permission to file their Second Motion to Compel in excess of the page limits up to 45 pages in length, excluding exhibits, caption, table of contents, table of authorities, and certificate of service. (ECF No. 111.)

Consistent with LR 7-3(c), this Motion to Exceed Page Limits is submitted in advance of the deadline for BANA's Opposition to Plaintiffs' Second Motion to Compel, due December 6, 2021, and it is supported by a declaration stating the reasons additional pages are needed and identifying the number of total pages needed as forty-two (42) for BANA's Opposition, excluding certificate of service, tables of contents and authorities, and any exhibits. This exceeds the twenty-four page limit set forth by LR 7-3(b) by eighteen (18) pages. *See* Ex. A.

Good cause exists to extend the page limit for BANA's Opposition. The local rule limits discovery motions and responses to 24 pages. LR 7-3(b). However, this Court granted Plaintiffs up to 45 pages for their Second Motion to Compel. (ECF No. 111.) Plaintiffs' Second Motion to Compel is 42 pages, excluding exhibits, caption, table of contents, table of authorities, and certificate of service. In order to fully address the arguments in Plaintiffs' Second Motion to Compel, with its excess pages approved by this Court, BANA requires an equal number of pages as BANA is unable to complete a comprehensive opposition without exceeding the limitation of 24 pages pursuant to Local Rule 7-3(b). *See* Ex. A. BANA consulted with Plaintiffs prior to filing this Motion and Plaintiffs indicated that they would not oppose this Motion.

In sum, good cause exists for the Court to grant BANA leave to exceed the permissible page limit and allow its Opposition to Plaintiffs' Second Motion to Compel to be up to and including forty-two (42) pages in length provided that it includes a table of contents and table of authorities in compliance with Local Rule 7-3(c).

CONCLUSION

For the reasons stated herein, BANA respectfully requests that this Court enter an order granting BANA leave, pursuant to Local Rule 7-3(c), to file its Opposition to Plaintiffs' Second Motion to Compel up to and including forty-two (42) pages in length, excluding exhibits, caption, table of contents, table of authorities, and certificate of service, and enter an order in the form attached hereto as **Exhibit B**.

Dated: December 2, 2021

SNELL & WILMER L.L.P.

/s/ Holly E. Cheong

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*Attorneys for Defendant Bank of America,
N.A.*

Order

IT IS SO ORDERED

DATED: 7:35 am, December 03, 2021



BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing **UNOPPOSED MOTION TO EXCEED PAGE LIMIT PURSUANT TO LOCAL RULE 7-3(c) FOR DEFENDANT BANK OF AMERICA'S OPPOSITION TO PLAINTIFFS' SECOND MOTION TO COMPEL (ECF NO. 195)** with the Clerk of the Court for the U. S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

DATED: December 2, 2021.

/s/ Maricris Williams
An Employee of Snell & Wilmer L.L.P.

INDEX OF EXHIBITS

Exhibit No.	Description	No. of Pages
A	Declaration of Holly E. Cheong, Esq.	2
B	Proposed Order	2

4880-7471-9237

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